

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No: CIV-21-1069-G

**PLAINTIFFS' NOTICE OF NEW AUTHORITY
AND NOTICE OF NATIONWIDE INJUNCTION**

Plaintiffs hereby gives notice that, on December 7, 2021, the U.S. District Court for the Southern District of Georgia issued a preliminary injunction enjoining, on a nationwide basis, the federal contractor vaccine mandate that Plaintiffs challenge in this case. *See Georgia v. Biden*, No. 1:21-cv-163, 2021 WL 5779939, at *12 (S.D. Ga.) (enjoining enforcement of “the vaccine mandate for federal contractors and subcontractors in all covered contracts in any state or territory of the United States”) (attached as Exhibit 1).

In light of the nationwide injunction issued in *Georgia*, the contractor mandate is now unenforceable in the State of Oklahoma. Accordingly, Plaintiffs hereby withdraw their request for a temporary restraining order. Plaintiffs are not, however, withdrawing their motion for a preliminary injunction at this time. Plaintiffs continue to request such an injunction, limited to the State of Oklahoma. In the alternative, the Court should hold Plaintiffs' motion for a preliminary injunction in abeyance, in case further developments

in the *Georgia* litigation require an expeditious ruling on the motion for a preliminary injunction.

Respectfully submitted,

Mithun Mansinghani

Solicitor General

OFFICE OF THE ATTORNEY GENERAL

OF THE STATE OF OKLAHOMA

313 NE 21st Street

Oklahoma City, OK 73105

(405) 521-3921

Mithun.mansinghani@oag.ok.gov

/s/ Gene C. Schaerr

Gene C. Schaerr*

H. Christopher Bartolomucci*

Riddhi Dasgupta*

Brian J. Field*

SCHAERR | JAFFE LLP

1717 K Street NW, Suite 900

Washington, DC 20006

(202) 787-1060

cbartolomucci@schaerr-jaffe.com

sdasgupta@schaerr-jaffe.com

bfield@schaerr-jaffe.com

* Admitted *pro hac vice*

*Counsel for Plaintiffs The State of
Oklahoma; J. Kevin Stitt, Governor of
Oklahoma; and John M. O'Connor,
Attorney General of Oklahoma*

Dated: December 8, 2021